

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BOARDS OF TRUSTEES OF THE  
LOCALS 302 AND 612 OF THE  
INTERNATIONAL UNION OF  
OPERATING ENGINEERS  
CONSTRUCTION INDUSTRY  
HEALTH AND SECURITY FUND, *et*  
*al.*,

Plaintiffs,

v.

SEATTLE TOWER CRANE LLC, a  
Washington limited liability corporation,  
Contractor's License No. SEATTTC840J7,  
UBI No. 603 547 456,

Defendant.

C21-584 TSZ

**ORDER TO COMPEL PRODUCTION  
OF EMPLOYMENT SECURITY  
DEPARTMENT RECORDS**

THIS MATTER, having come on regularly before this court upon motion of plaintiffs,  
and this court having before it the declaration of counsel filed in support of this motion and  
being otherwise duly advised in the premises,

NOW, THEREFORE, it is ADJUDGED AND ORDERED as follows:

ORDER TO COMPEL ESD RECORDS - 1  
C21-584 TSZ

BARLOW COUGHRAN  
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1325 FOURTH AVE., SUITE 910  
SEATTLE, WA 98101  
(206) 224-9900

2. This necessity outweighs any interest in the confidentiality or privacy of this information of the individual employees if counsel for plaintiffs treats these records as confidential and discloses only such information as is necessary to prosecute this action.

3. Pursuant to RCW 50.13.070, the Washington State Employment Security Department is now ORDERED to produce copies of originals of all documents or records in its possession related to employee reports of Seattle Tower Crane at a mutually agreed time and place between the Department and attorneys for the plaintiffs, within twenty (20) days of the date of service of this Order upon the Department.

Dated this 24th day of September, 2021.

Thomas S Zilly

THE HONORABLE THOMAS S. ZILLY  
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Noelle E. Dwarzski  
Noelle E. Dwarzski, WSBA #40041  
BARLOW COUGHRAN  
MORALES & JOSEPHSON, P.S.  
Attorneys for Plaintiffs